

# ASTM International

100 Barr Harbor Drive, PO Box C700  
West Conshohocken, PA, 19428-2959  
<http://www.astm.org>



August 28, 2008

Docket Operations  
U.S. Department of Transportation  
West Building, Ground Floor  
Room W12-140  
Routing Symbol M-30  
1200 New Jersey Avenue SE  
Washington, DC 20590

Re: Docket No. PHMSA-07-29364 (HM-231A)

Dear Sir/Madam:

We are writing in response to the FAA and PHMSA notice on possible changes to the Hazardous Materials Regulations, Docket No. PHMSA-07-29364. This rule adopts by references five ASTM standard specifications on packaging. Unfortunately, the rule does not cite the most current or "active" versions of these standard specifications which reflect the current "state of the art."

Known for their high technical quality, ASTM standards provide reliable physical and chemical requirements. ASTM International reviews each ASTM standard at least once every five years to ensure that its technical documents continue to meet industry needs and reflect the "state of the art." ASTM committees can also revise standards more frequently in response to new information, materials, or technologies.

ASTM standards have titles with year designations which refer to a specific edition of the standard, e.g., "-08" for 2008. Federal agencies may reference ASTM standards without including this year designation in order to designate that the most current version of the standard should be used; for example, by citing "ASTM D999" instead of "ASTM D999-01." While this type of reference may not always suit an agency's regulatory objective, we urge DOT to consider this approach whenever incorporating an ASTM standard into regulation.

The following table indicates how ASTM International would prefer DOT reference ASTM standards:

ASTM Standards referenced in Docket No. PHMSA-07-29364	Active standards	ASTM preferred standards reference
ASTM D4991-94 Standard Test Method for Leakage Testing of Empty Rigid Containers by Vacuum Method	ASTM D4991-07	ASTM D4991 Standard Test Method for Leakage Testing of Empty Rigid Containers by Vacuum Method
ASTM D999-01 Standard Test Methods for Vibration Testing of Shipping Containers	ASTM D999-07	ASTM D999 Standard Test Methods for Vibration Testing of Shipping Containers
ASTM D4169-04a Standard Practice for Performance Testing of Shipping Containers and Systems	ASTM D4169-08	ASTM D4169 Standard Practice for Performance Testing of Shipping Containers and Systems
ASTM D4728-01 Standard Test Method for Random Vibration Testing of Shipping Containers	ASTM D4728-06	ASTM D4728 Standard Test Method for Random Vibration Testing of Shipping Containers
ASTM F1140 Standard Test Methods for Internal Pressurization Failure Resistance of Unrestrained Packages	ASTM F1140-07	ASTM F1140 Standard Test Methods for Internal Pressurization Failure Resistance of Unrestrained Packages <b>(Correctly cited in Docket No. PHMSA-07-29364.)</b>

ASTM International would welcome the opportunity to provide DOT with up-to-date information about our standards. We would thus appreciate your help identifying an appropriate DOT contact person to provide guidance on an ongoing basis. ASTM International also encourages DOT representatives to participate directly in the technical committees that develop and maintain the ASTM standards used by the department.

Thank you for your consideration. If you have any questions, please do not hesitate to contact Kevin Cummins by e mail, [kcummins@astm.org](mailto:kcummins@astm.org), or phone (202) 223-8484.

Sincerely,

Kevin Shanahan  
Manager, Committees D10 and F02  
ASTM International

Kevin Cummins  
Director, Public Policy  
ASTM International

Cc: Committee Chairperson, ASTM Committee D10 on Packaging;  
Committee Chairperson, ASTM Committee F02 on Flexible Barrier Packaging